

CONSTANTINE A. DESPOTAKIS, ESQ. (CD 4944)
WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP
3 Gannett Drive
White Plains, New York 10604
Tel.: (914) 323-7000
Attorneys for Defendant, Bank of America, N.A.

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
PL SHIPPING & LOGISTICS LTD.

Plaintiff,

07 CV 2818 (SHS)

ANSWER TO DEFENDANT, H.J.M.
INTERNATIONAL, INC.'S
CROSSCLAIMS

-against-

H.J.M. INTERNATIONAL INC. and BANK OF
AMERICA and AFFORDABLE LUXURY
RYAN KENNY

Defendants.
-----X

Defendant, Bank of America, N.A. (sued herein under its common trade name of "Bank of America") hereinafter "BOA", by its attorneys, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, in answer to defendant, H.J.M. International, Inc.'s (hereinafter "H.J.M."), crossclaims against BOA alleges and answers as follows:

AS AND FOR AN ANSWER TO DEFENDANT,
H.J.M.'s CROSSCLAIMS AGAINST BOA

1. BOA denies each and every allegation contained in H.J.M.'s crossclaims as set forth in paragraphs 32 and 33 of H.J.M.'s answer to plaintiff's amended verified complaint dated June 25, 2007, and BOA repeats, reiterates and realleges each and every crossclaim asserted by

BOA against H.J.M. in this action as set forth in BOA's pleadings, the contents of which are incorporated by reference as though fully recited herein.

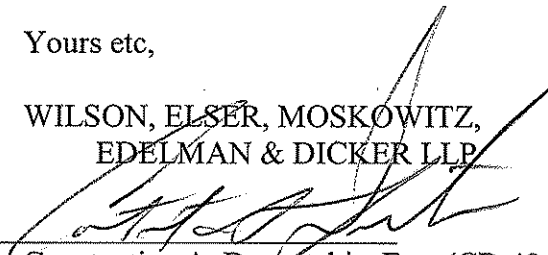
WHEREFORE, BOA respectfully requests an Order of the Court dismissing H.J.M.'s crossclaims and in the event plaintiff prevails in this action as against BOA, then an Order of the Court granting BOA judgment over against defendant H.J.M. pursuant to BOA's crossclaims, together with such other and further relief as to this Court may seem just and proper

Dated: White Plains, New York
June 28, 2007

Yours etc,

WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP

By


Constantine A. Despotakis, Esq. (CD 4944)
Attorneys for Defendant
BANK OF AMERICA, N.A.
3 Gannett Drive
White Plains, New York 10604
Tel. (914) 323-7000
Our File No. 02503.00305

To:

EUGENE J. MCDONALD, ESQ.
Attorneys for Plaintiff,
PL Shipping & Logistics Ltd.
170 Broad Street
Matawan, NJ 07747

Patrick Michael DeCharles II, Esq.
CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR
Attorneys for Defendant
H.J.M. International Inc.
61 Broadway, Room 3000
New York, NY 10006-2809

Affordable Luxury Ryan Kelly
Defendant *Pro Se*
1407 Broadway
New York, NY 10018

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF WESTCHESTER)

I, Geri Manno, being sworn, say:

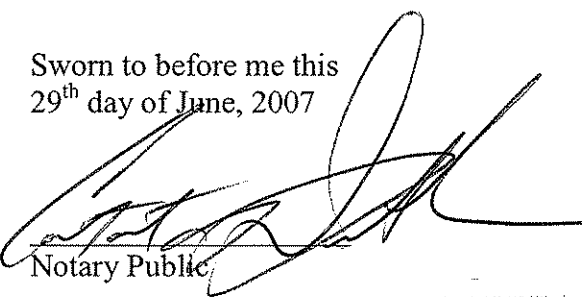
I am not a party to the action, am over the age of 18 years of age and reside in Westchester County, New York. On June 29, 2007, I served the within RESPONSE TO DEFENDANT, H.J.M. INTERNATIONAL, INC.'s CROSSCLAIMS by depositing a true copy thereof enclosed in a postpaid wrapper, via First Class Mail, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

EUGENE J. MCDONALD, ESQ.
Attorneys for Plaintiff,
PL Shipping & Logistics Ltd.
170 Broad Street
Matawan, NJ 07747

Patrick Michael DeCharles II, Esq.
CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR
Attorneys for Defendant
H.J.M. International Inc.
61 Broadway, Room 3000
New York, NY 10006-2809

Affordable Luxury Ryan Kelly
Defendant *Pro Se*
1407 Broadway
New York, NY 10018

Sworn to before me this
29th day of June, 2007


Notary Public


Geri Manno

1599732.1

CONSTANTINE A. DESPOJANIS
Notary Public, State of New York
No. 4615111
Qualified in Westchester County
Commission Expires 12/31/09